

# LUKAS, NACE, GUTIERREZ & SACHS

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February 25, 2008

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

Re: **EB Docket No. 06-36**  
**Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007**

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith, on behalf of Guam Cellular and Paging, the carrier's 2007 CPNI certification with accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Todd Slamowitz

Enclosures

cc: Enforcement Bureau, FCC (2)  
Best Copy and Printing, Inc. (1)



**Annual 47 C.F.R. 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2007

Date Filed: February 22, 2008

Name of company covered by this certification: Guam Cellular & Paging

Form 499 Filer ID: 812609

Name of signatory: Tommy L. Gibson

Title of signatory: Vice President-Engineering

I, Tommy L. Gibson, certify that I am an officer of the company named above. And acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed 

Guam Cellular & Paging ("Carrier"):

Address: 219 S. Marine Corps Drive  
Suite 206  
Tamuning, Guam 96913

### STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: No Action Necessary in 2007.

- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: Information available in trade publications, news media and research in the Industry. Employees are trained to be diligent with CPNI and assure identification.
  
- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: 0
  
  - Category of complaint:
    - 0 Number of instances of improper access by employees
  
    - 0 Number of instances of improper disclosure to individuals not authorized to receive the information
  
    - 0 Number of instances of improper access to online information by individuals not authorized to view the information
  
    - 0 Number of other instances of improper access or disclosure
  
  - Description of instances of customer complaints, improper access or disclosure: N/A